

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Roger Moulton,

Plaintiff,

v.

Credit Protection Association, L.P.

Defendant.

CIVIL ACTION NO. 1:15-cv-13077-GAO

PROPOSED JOINT SCHEDULING ORDER

Pursuant to Fed. R. Civ. P. 16, and this Court's Order of May 23, 2016 (DE #28), the parties hereby submit the following proposed joint scheduling order. A scheduling conference is presently set for June 6, 2016.

I. **Timetable for Discovery and Motion Practice**

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and by this Court's Notice of Scheduling Conference must be completed by June 13, 2016.

2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after July 15, 2016.

3. **Fact Discovery – Interim Deadlines.**

a. All requests for production of documents and interrogatories must be served by August 26, 2016.

b. All requests for admission must be served by September 30, 2016.

c. All depositions, other than expert depositions, must be completed by October 28, 2016.

4. Final Fact Discovery Deadline.

a. All discovery, other than expert discovery, must be completed by December 2, 2016.

5. Expert Discovery

a. The parties have not yet made a decision as to whether they will utilize the services of an expert witness in the underlying matter. If the parties elect to engage expert witnesses, they will timely advise the Court and propose a schedule for expert witness discovery.

6. Dispositive Motions

a. All dispositive motions must be filed by December 23, 2016.

Roger Moulton,
By his attorneys,

Credit Protection Association, L.P.
By Its Attorneys

/s/ Jeremy Glapion

Jeremy Glapion, *Pro Hac Vice*
1704 Maxwell Drive
Wall, NJ 07719
(732) 455-9737
(732) 709-5150 (facsimile)
jmg@glapionlaw.com

/s/ Andrew M. Schneiderman

Andrew M. Schneiderman, BBO #666252
Ranen S. Schechner, BBO #655641
HINSHAW & CULBERTSON LLP
28 State Street, 24th Floor
Boston, MA 02109
617-213-7000
617-213-7001 (facsimile)
aschneiderman@hinshawlaw.com
rschechner@hinshawlaw.com

Dated: May 27, 2016

CERTIFICATE OF SERVICE

I, Andrew M. Schneiderman, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Andrew M. Schneiderman

Andrew M. Schneiderman